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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC., AMERICAN
TECHNOLOGY SERVICES, COMPLIANCE
CONSULTANTS, CHROME BUILDERS
CONSTRUCTION, INC., and UNIFIED
DATA SERVICES,

Plaintiffs,

V.

BANK OF AMERICA, N.A., and JOHN and JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO AND REPLY IN SUPPORT OF
PLAINTIFFS' MOTION TO AMEND
AND SUPPLEMENT COMPLAINT, ADD
A PARTY, AND MODIFY THE
SCHEDULING ORDER**

(FIRST REQUEST)

Pursuant to Local Rules IA 6-1, 7-1, and 7-2, Plaintiffs Richard Zeitlin; Advanced Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified Data Services (the “Plaintiffs”) and Defendant Bank of America, N.A. (“BANA”), by and through their respective undersigned counsel of record, submit this Stipulation and Proposed Order for a 1-week extension of BANA’s deadline to file its response to Plaintiffs’ Motion to Amend and Supplement Complaint, Add a Party, and Modify the Scheduling Order (ECF No.

1 166) (the “Motion”). The Motion was filed on August 30, 2021 and is not set for hearing. The
2 Parties request an extension from September 13, 2021, BANA’s current deadline to respond, to
3 September 20, 2021.

4 The Parties also request that the deadline for Plaintiffs to file a reply in support of their
5 Motion be extended to October 7, 2021. Plaintiffs’ deadline to file a reply is currently seven days
6 after BANA files its response.

7 This is the Parties’ first request for an extension of the briefing deadlines for the Motion
8 and is not intended to cause any delay or prejudice to any party. The reason for the extension is to
9 give the Parties time to evaluate and respond to the arguments set forth in the Motion and
10 BANA’s response to the Motion.

11 **IT IS HEREBY STIPULATED AND AGREED** by and between the Parties that the time
12 for BANA to file their response to the Motion is extended to and through September 20, 2021 and
13 the time for Plaintiffs to file their reply in support of the Motion is extended to and through
14 October 7, 2021.

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1 IT IS SO STIPULATED.

2 Dated: September 8, 2021

3 THE BERNHOFT LAW FIRM, S.C.

4 /s/ Daniel James Treuden

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15 *Attorneys for Plaintiffs*

Dated: September 8, 2021

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/s/ Holly E. Cheong

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16 **Order**

17 IT IS SO ORDERED.

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19 UNITED STATES MAGISTRATE JUDGE

20 DATED: September 9, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO AND REPLY IN SUPPORT OF PLAINTIFFS' MOTION TO AMEND AND SUPPLEMENT COMPLAINT, ADD A PARTY, AND MODIFY THE SCHEDULING ORDER (FIRST REQUEST)** with the Clerk of the Court for the U. S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: September 8, 2021

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.

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